

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JEVON ECTOR,)	
on behalf of herself and all others)	
similarly situated,)	
)	
Plaintiff,)	07 C 6116
)	
v.)	Judge Grady
)	Magistrate Judge Ashman
CITY OF MARKHAM,)	
)	
Defendant.)	

NOTICE OF MOTION

To: See Certificate of Service

PLEASE TAKE NOTICE that on Wednesday, February 20, 2008 at 9:30 a.m., Plaintiff's counsel shall appear before the Honorable Judge John Grady, presiding in Courtroom 2201 of the U.S. District Court for the Northern District of Illinois, Eastern Division, and then and there present *Plaintiff's Unopposed Motion to Extend Briefing Schedule on Defendant's Motion to Dismiss Plaintiff's Complaint*, a copy of which is attached and hereby served upon you.

Respectfully submitted,

/s/ Lance Raphael
One of Plaintiff's Attorneys

Lance A. Raphael
Stacy M. Bardo
Allison A. Krumhorn
The Consumer Advocacy Center, P.C.
180 West Washington, Suite 700
Chicago, IL 60602
(312) 782-5808

CERTIFICATE OF SERVICE

I, Kym Lozano, paralegal, hereby certify under penalties of perjury according to 28 U.S.C. § 1748 that on January 30, 2008, I electronically filed the attached ***Plaintiff's Unopposed Motion to Extend Briefing Schedule on Defendant's Motion to Dismiss Plaintiff's Complaint*** with the Clerk of the Court using the CM/ECF system, which provides electronic notice to the following counsel of record:

Kathleen M. McDonough
Misty R. Martin
Segal McCambridge Singer & Mahoney
Sears Tower
233 S. Wacker Drive, Suite 5500
Chicago, IL 60606

/s/ Kym Lozano
Kym Lozano
Paralegal

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
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JEVON ECTOR,
on behalf of herself and all others
similarly situated,

Plaintiff,

V.

CITY OF MARKHAM,

Defendant.

07 C 6116

Judge Grady

Magistrate Judge Ashman

**UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE ON DEFENDANT'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Plaintiff Jevon Ector, by and through her attorneys, moves this Court for an order extending the briefing schedule on her Response to Defendant's Motion to Dismiss Plaintiff's Complaint. In support of her motion, Plaintiff states as follows:

1. Plaintiff's Response to Defendant's Motion to Dismiss is currently due on February 5, 2008.

2. However, the parties are currently engaging in settlement discussions. To that end, on January 17, 2008, the parties met and exchanged documents relating to the Plaintiff's individual and class claims, and counsel for Plaintiff, Lance A. Raphael and Aron Robinson, have made a settlement demand on Defendant. As of January 29, 2008, Defendant's counsel has yet to accept or reject this demand.

3. In order to avoid an unnecessary increase in attorneys' fees in a fee-shifting case, Plaintiff requests that she be given an additional 28 days to respond to Defendant's Motion to Dismiss.

4. The extension requested will give the parties sufficient time to see if the case can

settle before the Court will have to review written memoranda and consider oral argument.

5. Misty Martin, counsel for Defendant, does not oppose this motion.

6. Therefore, Plaintiff proposes the following new schedule:

Plaintiff's Response to Defendant's Motion to Dismiss shall be due March 4, 2008; and Defendant's Reply in Support of its Motion to Dismiss shall be due March 18, 2008.

WHEREFORE, Plaintiff Jevon Ector respectfully requests that this Court enter a modified briefing schedule on Defendant's Motion to Dismiss.

Respectfully Submitted,

By: /s/ Lance A. Raphael
One of Plaintiff's Attorneys

Lance A. Raphael
Stacy M. Bardo
Allison A. Krumhorn
The Consumer Advocacy Center, P.C.
180 West Washington, Suite 700
Chicago, IL 60602
(312) 782-5808

Aron D. Robinson
Law Office of Aron D. Robinson
19 South LaSalle Street, Suite 1300
Chicago, IL 60603
(312) 857-9050
Attorney I.D. 35546